

Public Comment
Landscape Irrigation GP
Deadline: 5/26/09 by 12 noon

From: <Robert.Heilman@amwater.com>
To: <commentletters@waterboards.ca.gov>
CC: <Tom.Bunosky@amwater.com>, <Randi.Knott@amwater.com>
Date: Thursday, May 21, 2009 2:12 PM
Subject: Comment Letter-Landscape Irrigation General Permit

State Water Resources Control Board:

As an Investor Owned Utility (IOU), California American Water (Cal Am) owns and operates several water and wastewater systems throughout the state. Most of our wastewater treatment facilities are relatively small (<1 MGD) and do not discharge to surface waters of the state. Our goal is to expand our service areas and to provide recycled water for landscape irrigation wherever feasible. Cal Am recognizes the current and future limitations being placed on potable water systems, due to the dwindling water supply. Therefore, we encourage, and even require, water conservation measures in many of our systems. We believe that the best use of the limited potable water supply is for human consumption and not for landscape irrigation. Since recycled water contains some of the required nutrients for vegetation, is much better suited for landscape irrigation purposes.

We appreciate that the State Water Resources Control Board (SWRCB) has crafted a general permit for landscape irrigation with the intention of streamlining the permitting process in accordance with the recently adopted Recycled Water Policy. Unfortunately, the current draft general permit contains many onerous conditions that would deter increasing the use of recycled water. Our intention is not to elaborate on those technical and implementation disincentives here, since a workgroup from the regulated public has been formed to work with the SWRCB staff to address those concerns.

Cal Am's main concern is that throughout the draft general permit, there is language that may implicitly exclude IOUs from enrollment in the general permit. The use of the words, "municipal" and "public entity," which are consistently used in the draft general permit, describe federal, state, city and county governmental agencies. Since Cal Am is neither a municipality nor a public agency, the draft general permit language appears to be somewhat discriminatory against IOUs. For Cal Am to fully support this general permit, we recommend that the wording of the draft general permit be revised to delete the term "public entity" or replace it with the term "utility." The second wording modification we suggest is changing the term "municipal recycled water" to "domestic recycled water." With the recommended revisions, it would be clear that both public and private utilities would be eligible to enroll in this general permit.

Thank you for extending the comment period for this draft general permit and your attention to our concerns. We look forward to working with the SWRCB to promote the use of recycled water for landscape irrigation throughout the state.

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